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October 1, 2003

RECEIVED
OFFICE OF
PAT MILLER

OCT 02 2003

Honorable Pat Miller, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

TN REGULATORY AUTHORITY

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-Month Proceeding)*
Docket No. 03-00491

Dear Director Miller:

In response to the Notice of Filing of Comments, dated September 23, 2003, issued in the above-styled docket, United Telephone Southeast, Inc., Sprint PCS and Sprint Communications Company LP ("Sprint") have reviewed the September 10th and 26th letters filed on behalf of BellSouth and CompSouth and the suggested schedules and procedures contained therein. Sprint is in general agreement with the proposal to attempt to coordinate schedules within the BellSouth region and to standardize, as much as possible, discovery, Confidentiality and Protective Agreements, and service of pleadings. However, Sprint has not been privy to the discussions surrounding those items. We would welcome the opportunity to work with BellSouth and CompSouth on acceptable procedures surrounding these items in advance of finalization by BellSouth and CompSouth. At a minimum, the pre-hearing conference proposed to address these issues should allow parties not privy to the discussions a meaningful opportunity to comment and effectuate any needed changes to the agreements.

Sprint also supports the action taken by the TRA at its September 22, 2003 Directors conference establishing separate dockets or subparts of one docket for the issues of Loop and Transport, Mass Market Switching and the Batch Cut Process. In addition, Sprint does not object to the general framework and timeframes suggested for the prefiling of testimony, the hearings, and the filing of briefs contained in the BellSouth/CompSouth letter except that the time for the filing of rebuttal should be extended by another week. It is also not clear whether the proposal contemplates simultaneous filing of Direct, Rebuttal and Surrebuttal by all parties or the filing of Direct by

Honorable Pat Miller
Page 2

a party challenging the national finding of impairment, Rebuttal by the other parties, and Surrebuttal by all parties. Sprint suggests that it makes the most sense to have any party challenging the national impairment finding to file Direct followed by the other parties filing Rebuttal. Parties filing Direct would then file Surrebuttal (mass market switching only) in response to the Rebuttal and the parties filing Rebuttal could file in response to each other.

The Notice also requested comments on the appropriate methodology for defining geographic markets and, if possible, initial proposals for geographic markets. We agree with the Commission, BellSouth and CompSouth that the definition of the appropriate market is a crucial issue to be decided, however, we also recognize, as does BellSouth and CompSouth, that it may be necessary to conduct discovery or to otherwise collect the data that may be relevant to resolving that issue. As such, we agree with the BellSouth and CompSouth proposal that the parties should address this issue in their testimony.

Please contact the undersigned if you have any questions.

Sincerely,

James B. Wright by Las
with
permission
James B. Wright

cc: Laura Sykora
Kaye Odum
Barry Counts
Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2003, a copy of the foregoing document was served on the parties of record via United States mail, postage paid and properly addressed to the following:

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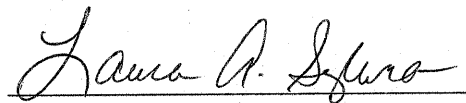
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